

Magistrate Judge Hon. Gabriel W. Gorenstein
U.S. District Court for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007
Via pro se electronic filing

MEMORANDUM ENDORSED

Re: Case No.: 23-cv-09648-JGLC-GWC Goodman v the City of New York et al


April 22, 2024

Dear Judge Gorenstein,

I write to respectfully request an extension of time to respond to defendants' motion to dismiss, (Dkt. 85) presently April 24, and to apologize for my earlier failure to respond by April 9. As the court is aware, vexatious nonparty David George Sweigert ("Sweigert") is involved in an aggressive, continuously ongoing effort to improperly affect the outcome of this case and to disrupt each and every aspect of my life. Earlier today, I received new information via a harassing USPS letter from Sweigert which has given rise to the need for a Rule 11 Safe Harbor notification letter that I sent to Ms. Anderson earlier today.

I respectfully request an extension of time to respond that provides Ms. Anderson with sufficient time to address the safe harbor notification. This is my first request for an extension of time to respond to the City's motion to dismiss, however the Court did previously extend the time sua sponte as a result of my failure to respond timely on April 17, 2024 (Dkt. 91). Due to the late arrival of USPS mail and the urgent nature of this new information, I have been unable to seek the input of defendants with regard to the extension of time, however Ms. Anderson has previously indicated her need for additional time.

Respectfully submitted,

 Jason Goodman

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

23-cv-09648-JGLC-GWC

-----X
JASON GOODMAN,

Plaintiff,

-against-

**CERTIFICATE OF
SERVICE**

THE CITY OF NEW YORK and NEW YORK CITY
POLICE DEPARTMENT, NEW YORK CITY MAYOR
ERIC ADAMS, NEW YORK CITY POLICE
DEPARTMENT LIEUTENANT GEORGE EBRAHIM,
NEW YORK CITY POLICE DEPARTMENT OFFICER
CHANDLER CASTRO, NEW YORK CITY POLICE
DEPARTMENT OFFICER JENNIFER CARUSO, NEW
YORK CITY POLICE DEPARTMENT OFFICER
KELVIN GARCIA, JOHN DOE 1, JOHN DOE 2, JOHN
DOE 3, JOHN DOE 4, JANE DOE, (fictitious names
intended to be officers, representatives, agents, servants of
the New York City Police Department, individually and in
their official capacities, ELON MUSK, X CORP, ADAM
SHARP.

Defendants.
-----X

It is hereby certified that pro se plaintiff, Jason Goodman, served counsel for Defendants
the City of New York, X Corp and Adam Sharp with a copy of the letter requesting an extension
of time to respond addresses below:

maanders@law.nyc.gov
ktrujillo-jamison@willenken.com
pshimamoto@willenken.com
jtmills@grsm.com
BMiddlebrook@grsm.com

Dated: New York, New York April 22, 2024

Respectfully submitted,



Jason Goodman
Pro Se Plaintiff

truth@crowdsourcethetruth.org
252 7th Avenue Apt 6s
New York, NY 10001
347-380-6998

The basis for the request for an extension is largely that an attorney for the City (not the plaintiff) requires “sufficient time” to address some other matter. This is not a proper basis for seeking an extension. Notwithstanding the absence of good cause (the standard under Fed. R. Civ. P. 6(b)(1)) and plaintiff’s failure to indicate exactly the time period he is seeking, the Court will grant plaintiff one additional week to respond to the City’s motion to dismiss. Any opposition must be filed on or before May 1, 2024. The City may file any reply on or before May 8, 2024. If plaintiff fails to meet the May 1, 2024 deadline, the motion will be deemed unopposed.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

April 24, 2024